

August 9, 2019

Via Electronic Filing

Hon. Jocelyn Boyd
Clerk of The Public Service Commission of South Carolina
101 Executive Drive, Suite 100
Columbia, SC 29210

Re: Johnson Development Associates, Incorporated's Proposed Questions for the Commission's Potential Independent Expert as Required by Act No. 62 of 2019.

Dear Ms. Boyd:

Pursuant to Order No. 2019-557 issued on in Docket Nos. 2019-184-E, 2019-185-E, and 2019-186-E, Intervenor, Johnson Development Associates, Inc. ("JDA"), by and through its undersigned attorneys, submits its Proposed Questions for the Commission's Potential Independent Expert as required by Act No. 62 of 2019. JDA respectfully requests that these questions be asked of all candidates whose notice of interview has been posted as of the time of filing on August 9, 2019.

1. To your knowledge, have you or anyone affiliated with your company ever performed work or otherwise received compensation for services for any of the following: Duke Energy or its subsidiaries, Dominion Energy or its subsidiaries, SCANA Corporation, South Carolina Solar Business Alliance, Incorporated, Johnson Development Associates, Incorporated, Wal-Mart, Incorporated, Nucor Corporation, or the law firms of Robinson Gray Stepp & Laffitte, LLC (or its predecessors Sowell Gray and Robinson McFadden), Womble Bond Dickinson, LLC, Willoughby & Hoefer PA, or lawyers Frank Ellerbe, Belton Zeigler, or Mitchell Willoughby? If so, what was the amount of the compensation received and when did the engagement(s) occur?
2. To your knowledge, have you or anyone affiliated with your company ever served as an employee, officer, or director for any of the following: Duke Energy or its subsidiaries, Dominion Energy or its subsidiaries, SCANA Corporation, the member companies of the South Carolina Solar Business Alliance, Incorporated, Johnson Development Associates, Incorporated, Wal-Mart, Incorporated, or Nucor Corporation?

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3. To your knowledge, do you or anyone affiliated with your company own stock or otherwise have a financial interest in any of the following: Duke Energy or its subsidiaries, Dominion Energy or its subsidiaries, SCANA Corporation, the member companies of the South Carolina Solar Business Alliance, Incorporated, Johnson Development Associates, Incorporated, Wal-Mart, Incorporated, or Nucor Corporation?
4. Do you and your company have a process in place that ensures the independence of your company and its employees and contractors? Please describe.
5. What utility trade organizations have you or your company been a member of and has your company performed any services for a utility trade organization?
6. Do you have experience in rate design and the calculation of avoided cost? What methodologies have you previously used for such calculations?
7. Have you reviewed Act No. 62 of 2019? If so, please explain what you believe your role to be under the Act? If not, please explain why you have not reviewed the Act?
8. Are you capable and qualified to submit a report that includes your independently derived conclusions as to your opinion of each utility's calculation of avoided costs in these proceedings? Are you capable and qualified to issue a statement in your report which assesses the level of cooperation received from the utility during the development of the report and whether there were any material information requests that were not adequately fulfilled by the electrical utility?
9. Are you comfortable informing the Commission, should the situation arise, of a utility's avoided cost filing lacking sufficient clarity in being not reasonably transparent so that underlying assumptions, data, and results can be independently reviewed and verified by the parties and the Commission?
10. Are you aware that SC Code Ann. § 58-41-20(F)(2) states that it is the State of South Carolina's express policy to encourage renewable energy?
11. Do you know of any reason not previously mentioned that would make it difficult for you or your company to render an impartial report or to advise this Commission in an impartial manner?

Very truly yours,

s/ James H. Goldin
James H. Goldin

JHG:jc
Enclosure

Cc: All Parties of Record (via email and electronic filing)
Joseph Melchers, Esquire (via email)